



July 23, 2012

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12th Street, SW,  
Room TW-A325  
Washington, DC 20554

Re: ***In the Matter of Noncommercial Educational Station  
Fundraising for Third-Party Non-Profit Organizations  
MB Docket No. 12-106***

Dear Ms. Dortch:

Columbia Bible College Broadcasting Company ("CBCBC"), licensee of Noncommercial Educational ("NCE") Stations WRCM(FM), Wingate, NC and WMHK(FM), Columbia, SC, responds to the FCC's invitation for comments on the Notice of Proposed Rulemaking regarding NCE station fundraising for third-party non-profit organizations.

As an NCE station designed to serve and educate our community, we have found that the current rules have unduly limited our broadcasting activities and, accordingly, our mission. The current rules are too restrictive. They prohibit NCE stations like ours from conducting fundraising activities to benefit any other entity if the activities would substantially alter or suspend regular programming unless our station obtains a waiver from the FCC. In our experience, the non-profit organizations that we wish to assist in the matter of fundraising themselves exist to serve and educate citizens too, albeit in different ways than we as broadcasters do. We have worked with the following types of organizations, but we would welcome the opportunity to further serve and educate our community of listeners as permitted by relaxation of the rules.

- Child poverty relief organization: Working with this organization would serve to educate our listeners more fully about the needs of children around the world who suffer in extreme poverty. It would also provide the listeners an opportunity to get involved and make a difference.
- Crisis pregnancy centers in our local community: Working with these types of local organizations would serve to educate our listeners more fully about the needs of women in our own community that have nowhere to turn when faced with an unplanned pregnancy. Listeners would have new opportunities to get involved and make a difference.

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Matthews NC 28106

Street Address 1092 Radio Drive  
Indian Trail NC 28079

Fax Number 704::821::9285

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Web Address [www.newlife919.com](http://www.newlife919.com)



- Non-profit adoption foundation: Working with this foundation would educate listeners about the plight of “unwanted” children and the chance to help local couples who desire to adopt.

Based on these and other examples, CBCBC urges the FCC to avoid unduly limiting the kinds of third-party non-profit organizations that may benefit from on-air fundraising activities conducted on NCE stations. The FCC should avoid the kind of arbitrary, confusing line drawing inherent in the current rules. Vague standards like these create chilling effects and undue burdens for NCE stations seeking to serve the public by conducting fundraising for worthy non-profit organizations. For this reason, CBCBC believes that if the FCC limits fundraising on NCE stations for third-party non-profits, the limit should be objective such that the NCE station could substantially alter or suspend regular programming up to a specific percentage of a NCE station’s total annual airtime.

The FCC should reject any requirement for the NCE station itself to conduct all third-party fundraising activities. The collection and distribution of funds and all incidental activities would create an undue burden on most NCE stations and would dampen worthy efforts to serve the public.

Finally, CBCBC agrees that while we have no objection to including reports in our local public inspection file on any third-party fundraising activities, it would be burdensome for NCE stations such as ours to be required to also file periodic reports to the FCC.

Thank you for taking up the consideration of this matter. If I can further explain our thoughts on any of these questions, please contact us. We sincerely hope that, for the best interests of our communities, the FCC will relax the rules on third-party fundraising in the very near future.

Sincerely,

A handwritten signature in blue ink, appearing to read "Joe Paulo".

Joe Paulo  
Director of Broadcasting  
WRCM – Wingate, NC  
WMHK – Columbia, SC